

1 Hon. Ricardo S. Martinez  
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6 UNITED STATES DISTRICT COURT  
 7 WESTERN DISTRICT OF WASHINGTON  
 8 AT SEATTLE

9 JOSEPH SANT, MERTON CHUN,  
 10 RONESHA SMITH, and HEATHER  
 NICASTRO, individually and on behalf of all  
 others similarly situated

11 Plaintiffs,

12 vs.

13 ROCKETREACH LLC,

14 Defendant.

15 Case No. 2:24-cv-1626 RSM

16 STIPULATED MOTION TO EXTEND  
 17 DEADLINE TO RESPOND TO  
 COMPLAINT AND SET BRIEFING  
 18 SCHEDULE

19 **STIPULATION**

20 WHEREAS, Plaintiffs Joseph Sant, Merton Chun, Ronesha Smith, and Heather Nicastro  
 21 (collectively, “Plaintiffs”) filed Case No. 2:24-cv-1626 against RocketReach LLC (“Defendant”)  
 22 on October 8, 2024;

23 WHEREAS, Defendant was served with Plaintiffs’ Complaint on October 23, 2024;

24 WHEREAS, Defendant’s deadline to respond to Plaintiffs’ Complaint is November 13,  
 25 2024;

26 WHEREAS, Defendant recently retained counsel, and to provide Defendant sufficient time  
 27 to respond, the parties have agreed, subject to Court approval, to an extension of time to respond;

28 THEREFORE, Plaintiffs and Defendant hereby STIPULATE AND AGREE to extend the  
 29 deadline for Defendant to answer or otherwise respond to the Complaint to December 28, 2024.

1 This stipulation shall not operate as an admission of any factual allegation or legal conclusion, nor  
 2 shall it operate as a waiver or otherwise affect any right, defense, claim or objection by any party.

3 In the event Defendant files a response by motion, the parties further agree to extend the  
 4 response and reply deadlines as follows. The deadline for Plaintiffs' response to Defendant's  
 5 motion shall be February 11, 2025; and the deadline for Defendant's reply shall be March 13, 2025

6 Stipulated to this \_\_\_\_ day of November, 2024.

7 Presented and stipulated to by:

8 NICK MAJOR LAW

10 By: /s/ Nick Major

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20 Stipulated to by:

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23 By: /s/ Patrick G. Lynch  
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*Attorneys for RocketReach LLC.*

## ORDER

IT IS SO ORDERED.

DATED this 6th day of November, 2024.

  
HON. RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE

STIPULATED MOTION TO EXTEND DEADLINE TO  
RESPOND TO COMPLAINT AND SET BRIEFING  
SCHEDULE - 3  
Case No. 2:24-cv-1626

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